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DOCKET NO. YOR920030316US1

<u>REMARKS</u>

Claims 1-4, 6-13, and 15-23 are all the claims presently pending in the application. Claims 1-2, 4, 8-10, 12, 16-18 and 20-23 are amended to more clearly define the invention and claims 5 and 14 are canceled. Claims 1, 4, 8, 10, 12, 16-17 and 20-23 are independent.

These amendments are made only to more particularly point out the invention for the Examiner and not for narrowing the scope of the claims or for any reason related to a statutory requirement for patentability.

Applicants also note that, notwithstanding any claim amendments herein or later during prosecution, Applicants' intent is to encompass equivalents of all claim elements.

Claims 1-23 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Hanna et al. reference.

This rejection is respectfully traversed in the following discussion.

I.   **THE CLAIMED INVENTION**

An exemplary embodiment of the claimed invention is directed to a descriptor propagation system that includes a descriptor acceptance device that accepts a first descriptor associated with a first content granularity, a descriptor propagation device that propagates the first descriptor to a second content granularity that is finer than the first content granularity. The descriptor propagation device propagates the first descriptor without prior data regarding the first descriptor at the second granularity.

Conventional systems and methods are not capable of allowing a user to annotate content at any granularity that is coarser than the granularity at which the annotation actually exists, where the system and method then propagates or maps the annotation to the appropriate content granularity. Thus, there has been an acute need for a system and method of developing coarse to fine descriptor propagation, particularly in the domain of multimedia content.

The present invention provides a system and method which accepts a first descriptor associated with a first content granularity and which then is capable of propagating the first descriptor to a second content granularity that is finer than the first content granularity. In this manner, the present invention is capable of propagate a descriptor to an appropriate level of

granularity (the second content granularity) that is finer than the granularity at which the descriptor was received (from the user or elsewhere).

Further, the present invention is capable of propagating the descriptor <u>without prior data regarding the descriptor at the second granularity</u>.

II.   THE PRIOR ART REJECTION

The Examiner alleges that the Hanna et al. reference teaches the claimed invention. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by the Hanna et al. reference.

The Hanna et al. reference does not teach or suggest the features of the claimed invention including propagating the descriptor <u>without prior data regarding the descriptor at the second granularity</u>. As explained above, this feature is important for automatically propagating a descriptor to an appropriate content granularity while only receiving the descriptor at a different, coarser granularity (from, for example, the user).

The Hanna et al. reference discloses an automatic teller machine which receives an image of a person and then identifies a head of that person in a portion of that image. The person being the first descriptor, the entire image being the first content granularity, the head of the person being a second descriptor, and the region of the head in the image being a portion of the image at a second content granularity (portions of the image).

In stark contrast to the claimed invention, the Hanna et al. reference does not teach or suggest propagating any descriptor at all.

Rather, the Hanna et al. reference discloses that a first descriptor (the person) is associated with a first content granularity (the entire image) and that a second descriptor (the head of the person) is associated with a second content granularity (a portion of the image). These associations are predefined. In other words, before any images are received, the system of the Hanna et al. reference knows that the first descriptor is associated with the first content granularity and that the second descriptor is associated with the second content granularity.

The Hanna et al. reference does not teach or suggest propagating any descriptor at all, let alone propagating any descriptor to another content granularity without prior data regarding that

descriptor at the second content granularity.

For example, using the example which is cited by the Examiner in the Hanna et al. reference, an exemplary embodiment of the claimed invention would propagate the first descriptor of "the person" at the first content granularity (the entire image) to the second content granularity (a portion of the image) without prior data regarding the person descriptor at the second content granularity. In other words, the claimed invention propagates the same descriptor (the person) to a finer content granularity.

In stark contrast, the Hanna et al. reference not only discloses associating a different descriptor "the head of a person" to a finer content granularity, but the Hanna et al. reference relies upon prior data regarding descriptor of "the head of a person" being associated with the second content granularity.

Indeed, the Hanna et al. reference suffers from exactly the same problems that are solved by the claimed invention. The Hanna et al. reference relies upon prior data regarding descriptors (e.g. associating the first descriptor, "the person," with the first content granularity, "the entire image," and the second descriptor, "the head of the person," with the second content granularity, "a portion of the image."). These associations are defined when the system is designed and/or as defined by a user. In stark contrast, the claimed invention propagates a descriptor from a first content granularity to a second content granularity. In this manner, the claimed invention is capable of automatically propagating a descriptor to an appropriate content granularity while only receiving the descriptor at a different, coarser granularity (from, for example, the user).

Therefore, the Examiner is respectfully requested to withdraw the rejection of claims 1-4, 6-13, and 15-23.

III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully submit that claims 1-4, 6-13, and 15-23, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

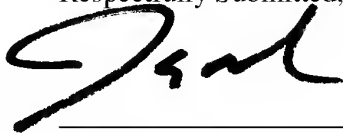Should the Examiner find the Application to be other than in condition for allowance, the

Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

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